

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**DAVID NEWBIGGING BROWN
O'CONNOR,**

Plaintiff,

v.

**JEFF LONG, in his official capacity
as Commissioner of the Tennessee
Department of Safety and Homeland
Security,**

Defendant.

JURY DEMANDED

DECLARATION OF DAVID NEWBIGGING BROWN O'CONNOR

I, David Newbigging Brown O'Connor, the plaintiff in the above-entitled action, hereby declare that I am over the age of eighteen (18) and competent to testify to the matters stated to my personal knowledge. I declare that I have read the Verified Complaint and the included exhibits and know their contents. I declare that the allegations in the Verified Complaint, including all exhibits, are true to my own personal knowledge.

I declare under penalty of perjury that the foregoing is true and correct to my own personal knowledge on this the 15th day of July, 2024 in Nashville, Tennessee.



David O'Connor (Jul 15, 2024 13:17 EDT)

David Newbigging Brown O'Connor